# LOUISIANA STATE CONFERENCE NAACP

# Exhibit D

# Cynthia Barber Declaration

**UNITED STATES DISTRICT COURT**
**WESTERN DISTRICT OF LOUISIANA**
**ALEXANDRIA DIVISION**

Case No. 69-cv-14430

UNITED STATES OF AMERICA,

        Plaintiff,

    v.

CATAHOULA PARISH SCHOOL BOARD,
ET AL,

        Defendants.

**DECLARATION OF CYNTHIA BARBER**

I, Cynthia Barber, do hereby declare as follows:

    1.    I make this Declaration based on my own personal knowledge and am competent to testify concerning the matters set forth below.

    2.    I am the parent of T.B., who is an 11th grade student at Block High School.  Prior to attending Block High School, my daughter attended Jonesville Elementary and Jonesville Junior High.

    3.    In order to graduate, my daughter must pass the Biology or U.S. History test that is required by the state.  My daughter has taken each test three times and failed.  Block High School does not have a certified Biology or U.S. History teacher to actually teach and prepare the students for what is on the tests.

4.      In addition to my daughter attending Block High School, I substitute teach there. The conditions I have witnessed there are horrible.  For example, the air conditioners are run down, there is only one bathroom per gender for students to use, and those bathrooms leak when it rains due to missing ceiling tiles.  The school only recently replaced the ceiling tiles about 3 weeks ago.  The girls' restroom also has holes in the stall doors and so there is no privacy for the students.  Sometimes when my daughter is menstruating, she has called me to ask me to take her home because she feels like she has no privacy, and I would prefer for her to stay at home in those circumstances.

5.      My daughter was enrolled at Harrisonburg High School for approximately two weeks in 2015.  Unlike Block High School, Harrisonburg was in good condition, clean and appeared to be a well-functioning school.


I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.


Dated: 3/11/19


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Cynthia Barber


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